

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RICHARD ODDO,	)	Bankruptcy No.: 15-24387-GLT
	)	
Debtor,	)	Chapter 13
	)	
RONDA J. WINNECOUR, Trustee,	)	
	)	
Movant,	)	
v.	)	Document No.
	)	
RICHARD ODDO,	)	
	)	
Respondent	)	Related to Document Nos. 99, 100
	)	
	)	
	)	
	)	
	)	

**DEBTORS' DECLARATION IN RESPONSE TO TRUSTEE'S CERTIFICATE OF  
DEFAULT**

Pursuant with the Order of Court entered on July 20, 2018 after reasonable investigation and upon review of the existing Chapter 13 Plan, the Debtor avers that he will be able to cure the current plan arrears via a lump sum payment resulting from resolution of Debtor's wrongful termination claim. Debtor currently receives unemployment compensation and while an attachment order for said compensation was granted on May 7, 2018, the payment has yet to remit. After consultation with counsel, Debtor has agreed to enroll in the TFS program to ensure that payments continue to be made on the plan pending the resolution of his employment issues.

Dated: September 4, 2018

/s/Brian C. Thompson, Esquire  
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